

Docket Number: TG-9901616
Comments by: Rodney G. Hansen, Manager, King County Solid Waste Div.
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Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
1300 S Evergreen Park Drive SW
Post Office Box 47250
Olympia, WA 98504-7250

RE: Docket No. TG-990161, Solid Waste Rulemaking: 480-70 WAC

Dear Ms. Washburn:

The purpose of this letter is to provide comments on behalf of the King County Solid Waste Division regarding the proposed rule, Chapter 480-70 WAC Solid Waste Collection Companies, Commission Docket TG-990161. Our comments are limited to the following sections:

WAC 480 -70-011 Exempt operations, subsection (e):

We suggest that this subsection be changed as follows:

(e) The operations of a recycling company or nonprofit entity collecting and transporting recyclable materials from a buy-back center, drop box, or from a commercial, agricultural or industrial generator of recyclable materials when those recyclable materials are being transported for use other than landfill disposal or incineration, or under agreement with a solid waste collection company

The draft King County Solid Waste Plan encourages the development of small-scale local composting options for stable wastes as one method for reducing surface water impacts related to improper manure management. Stables are more like commercial than residential operations, given the amount of material generated. We would also like to encourage development of localized transportation options for hauling manure from stables to these nearby facilities.

WAC 480-70-041 Definitions, general; "Commercial recycling service": For the reasons stated above, we recommend that this definition be changed to read as follows:

"Commercial recycling service" means transportation of recyclable commodities from a buy-back center, drop box, or from a commercial, agricultural or industrial generator of recyclable materials when those recyclable materials are being transported

for use other than landfill disposal or incineration. Commercial recycling is regulated under chapter 81.80 RCW.

WAC 480-70-351 Rates, recycling programs and credits (page 53): We support the Commission's policy of encouraging solid waste collection companies to develop programs intended to increase recycling, and its willingness to consider programs that offer incentives to change behaviors or actions that pose barriers to increased recycling. We also support the proposed methodology for estimating recycling revenues as part of the program for returning recycling revenues to customers.

WAC 480-70-361 Availability of information (pages 54-55): We would like to strongly support the new requirements in subsection (7) to provide information about recycling services, including local commercial recycling, and options for reducing waste. King County will be pleased to coordinate with our local haulers in developing materials to be provided to customers.

There is another issue that we would like the Washington Utilities and Transportation Commission to consider within the context of this rulemaking. In meetings to develop issue papers for the state Solid Waste Plan update, King County staff has asked the Commission to determine whether small businesses might, at their option, choose to sign up for solid waste collection service (can or toter) under single family residential tariffs. In King County's case, these tariffs include recycling service as an embedded fee. We believe that this option would provide additional opportunities for businesses with small waste streams to recycle. If the Commission determines that additional language in this rule is needed to make this option allowable, we urge the Commission to make the necessary changes.

Thank you for the opportunity to provide these comments. If you have any questions, please contact Bill Reed at (206) 296-4402 (bill.reed@metrokc.gov).

Sincerely,

Rodney G. Hansen, Ph.D., P.E.
Manager

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